

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA
LINCOLN DIVISION**

CATHERINE PALMER,)	
)	
<i>Individually and on behalf of all others</i>)	
<i>Similarly situated</i>)	
)	CASE NO. 4:19-CV-3084
Plaintiff,)	
)	JUDGE JOHN M. GERRARD
vs.)	
)	
KCI USA, INC.,)	
)	
Defendant.)	

**PLAINTIFF’S RESPONSES TO DEFENDANT KCI USA, INC.’S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Plaintiff, Catherine Palmer (hereinafter "Palmer" or "Plaintiff"), by her attorneys, provides the following objections and responses (“Objections and “Responses”) to Defendant KCI USA, Inc.’s (“KCI” or “Defendant”) First Set of Interrogatories and Requests for Production of Documents (the “Requests”):

Preliminary Statement

Plaintiff submits her answers and responses to the Requests solely for the purpose of this action. Each of Plaintiff’s answers and responses is subject to all objections as to competence, relevance, materiality, propriety, admissibility, privilege, privacy and the like. Plaintiff reserves the right to interpose any objections at the time of trial.

Plaintiff does not intend to make any incidental or implied admissions by way of her answers and responses to the Requests. Defendant should therefore not assume that Plaintiff’s answer or response to any particular Request constitutes an admission that: (a) Plaintiff accepts or admits the existence of any fact set forth or assumed by the particular request; (b) Plaintiff has in

Court's deadline for her to do so. Plaintiff further objects to this request because it seeks disclosure regarding witnesses who will not testify. Plaintiff will produce documents responsive to this request to the extent permitted by Rule 26 in accordance with this Court's orders regarding the timing of expert disclosures.

5. Identify all dates where you have sent, or received, written communications from KCI and the content of such communications.

ANSWER: Plaintiff objects to this request to the extent it requests information not relevant to any party's claim or defense. Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

Pursuant to FRCP 33(d), Plaintiff refers Defendant to the following bates numbered documents: Palmer_0001-005.

6. From January 1, 2019 through the present, and for your telephone number described in the Complaint, identify the cellular telephone associated with that number (including manufacturer and model), the owner of that cellular telephone, the subscriber to that number, the telephone carrier or provider for that number, and the date when you procured that number.

ANSWER: Subject to and without waiving the foregoing objection, Plaintiff responds as follows:

Plaintiff Catherine Palmer is the owner and subscriber to the cellular telephone number ((402) 336-██████) described in the Complaint. Ms. Palmer's telephone carrier is Viaero Wireless. Ms. Palmer believes she procured the phone number in or around 2007. Her cell phone was an iPhone 5c.

7. For each of the telephone calls you allege in your Complaint to have received, separately identify the telephone number that received the telephone call, the time and date that the telephone call was received, and whether you or another person answered the telephone call.

VERIFICATION

I, Catherine Palmer, under penalties as provided by law, the undersigned, certify that I have read Plaintiff's Responses and Objections to Defendant's First Set of Interrogatories and that I solemnly affirm under the penalties of perjury that the contents of the foregoing document are true to the best of my knowledge, information, and belief.

DocuSigned by:
Catherine Palmer
5F53EF8640964EE...
Catherine Palmer

CERTIFICATE OF SERVICE

I, Gary M. Klinger, hereby certify that on the 11 day of February, 2020, I sent true and exact copies of the foregoing to the following persons via electronic mail:

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/s/ Gary M. Klinger

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